

Wireless Universal Services

Wireless State-of-the-Art Equipment Enables Carriers to Offer More Service Options

Network Infrastructure

Wireline

Wireless

Switching

Some Electro/Mechanical

State-of-the-Art
Digital

Local Loops

Some Multi-Party Lines
Some Older Limited
Capability Loops

Dynamic Assignment
Analog and Digital

Wireless Universal Services

Wireless Carriers are Capable of Providing Services Not Offered by Some Telcos Serving Rural Areas

<u>Network Services Offered</u>	<u>OPASTCO Wireline</u>	<u>Western Wireless***</u>
Voicemail	47.5%**	100%
EAS	39.1%*	100%
TouchTone	64.6%*	100%
Single Line Service	96.5%*	100%
911 Service	54.4%*	100%

**Keeping Rural America Connected: Costs and Rates in the Competitive Era, OPASTCO (1994)*

***OPASTCO Internet Site: <http://www.opastco.org/PRODSRVC.html>*

****Western Wireless services which we believe are representative of all wireless carriers*

Wireless Universal Services

Wireless Carriers Utilize Extended Local Calling Areas (LCAs)

	<u>Wireline</u>	<u>Western Wireless</u>
Montana LCAs	Numerous*	1
North Dakota LCAs	Numerous	1

* In Montana, for example, U S West has 16 extended LCAs and there are 18 independent LECs with their own LCAs.

Wireless Universal Services

- Mobility is Vital in Sparsely Populated Areas
 - Long Distances Between Towns
 - Low Density of Public Pay Phones
 - Rural Commerce Depends More on Mobility
- Access to Emergency Services is More Important

Lower USF Costs

Cost is Inversely Related to Density

<u>State</u>	<u>Population Density (Per Sq. Mile)</u>	<u>Wireline Subsidy for Resident Lines*</u>	<u>Wireline Subsidy Per Population</u>	<u>Wireline Subsidy for All Lines*</u>	<u>Wireline Subsidy Per Population</u>
North Dakota	9.3	\$118.0	\$185	\$152.9	\$239
Montana	5.5	\$149.0	\$186	\$183.1	\$229
Nevada	10.9	\$42.3	\$35	\$51.6	\$43
Wyoming	4.7	\$51.7	\$114	\$60.3	\$133
Texas	64.9	\$400.7	\$24	\$466.0	\$27
All States	70.3	\$4,965.1	\$20	\$5,560.9	\$22

**Subsidies, in millions, based upon results of HAI Wireline Cost Model and benchmark revenues of \$31 per month for residential lines and \$51 per month for business lines.*

Lower USF Costs

Wireless Cost is Substantially Lower in Rural Areas

<u>State</u>	<u>Average Line Density</u>	<u>Wireless Cost Per Line*</u>	<u>Wireline Cost Per Line</u>
Montana - Urban	59.04/sq. mile	\$56.31/mo.	\$22.22/mo.
Montana - Rural	5.77/sq. mile	\$92.90/mo.	\$188.84/mo.
North Dakota - Urban	41.48/sq. mile	\$58.71/mo.	\$22.74/mo.
North Dakota - Rural	3.90/sq. mile	\$77.35/mo.	\$178.21/mo.

** Based upon preliminary HAI wireless cost model results.*

Lower USF Costs

Potential Subsidy Savings Using Wireless Technology

Estimated Subsidy for Wireline Carriers	\$5,560,924,012
Estimated Subsidy Using Wireless Technology	<u>\$2,936,667,737</u>
Estimated Potential Subsidy Savings (48%) *	\$2,624,256,275

** The overall subsidy is based upon HAI wireline cost model and the preliminary results of the HAI wireless cost model for Montana and North Dakota and estimated for the other states*

Lower USF Costs

Wireless Will Greatly Reduce Subsidies

	<u>North Dakota</u>	<u>Montana</u>
Wireline USF Subsidies		
Federal Share	\$29.5	\$37.3
State Share	<u>\$88.5</u>	<u>\$111.7</u>
Total	\$118.0	\$149.0
Wireless USF Subsidies		
Federal Share	\$16.7	\$18.5
State Share	<u>\$50.3</u>	<u>\$55.5</u>
Total	\$67.0	\$74.0
Total Savings with Wireless Technology	\$51.0	\$75.0

Public Interest Benefits of Wireless Solution

- Greater Competition Especially in Rural Areas
- Availability of Additional Services
- Rapid Delivery of Additional Services to the Public
- Bring Service to Unserved Areas
- Lower Cost of Subsidies at Federal and State Level

Public Interest Benefits of Wireless Solution

Competition Exists in the Residential Wireless Market

	# of Wireless Carriers*	# of Landline Carriers
Texas	4	1
Oklahoma	5	1
Colorado	5	1
Kansas	5	1
Nebraska	3	1
Idaho	2	1
Nevada	3	1
North Dakota	4	1
South Dakota	2	1
Montana	3	1
Wyoming	2	1
Minnesota	4	1
Missouri	4	1
New Mexico	4	1
Utah	3	1

Challenges and Obstacles

- Establishing and Maintaining a Competitive Universal Service System in Territories Served by Rural Telcos
- Establishing State Universal Service Rules that Do Not Disadvantage Wireless Carriers
- Maintaining a Competitively-Neutral Universal Service System that takes into Account the Unique Advantages of Wireless

Federal/State Action Items

- Universal Service Support based upon Most Cost-Effective Technology
- Allow Consumers in Rural Areas to Immediately Choose a Competitive Carrier for Universal Service
 - Beginning January 1, 1999, Carriers Serving Rural Areas should Receive Support based upon Forward-Looking Costs

Federal/State Action Items

- Allow Consumer to Choose the Universal Service Offering that Best Suits Their Needs
 - No Need to Predetermine the Rate and Usage Level
- FCC Needs to Take Action if States Adopt Unreasonably Discriminatory Universal Service Requirement

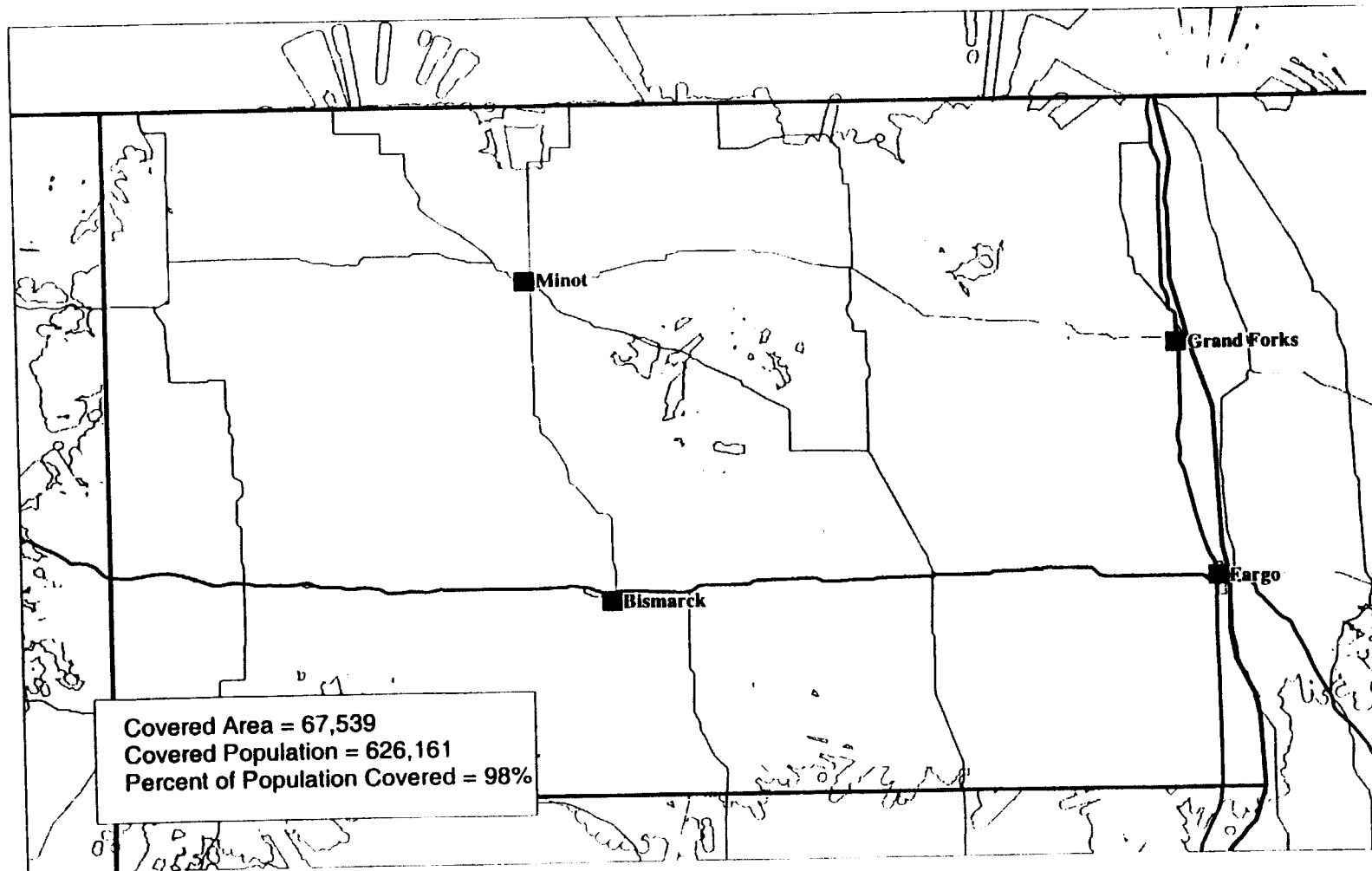
Appendix

Universal Service Opportunities

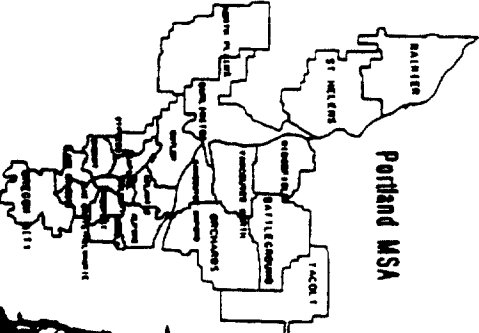
Pay Phones Today

<u>State</u>	<u>Pay Phone Lines</u>	<u>Pay Phones/Sq. Mile</u>
Massachusetts	46,323	5.91
Texas	102,512	.30
Nevada	6,893	.06
North Dakota	2,621	.04
Wyoming	3,628	.04
Montana	4,495	.03

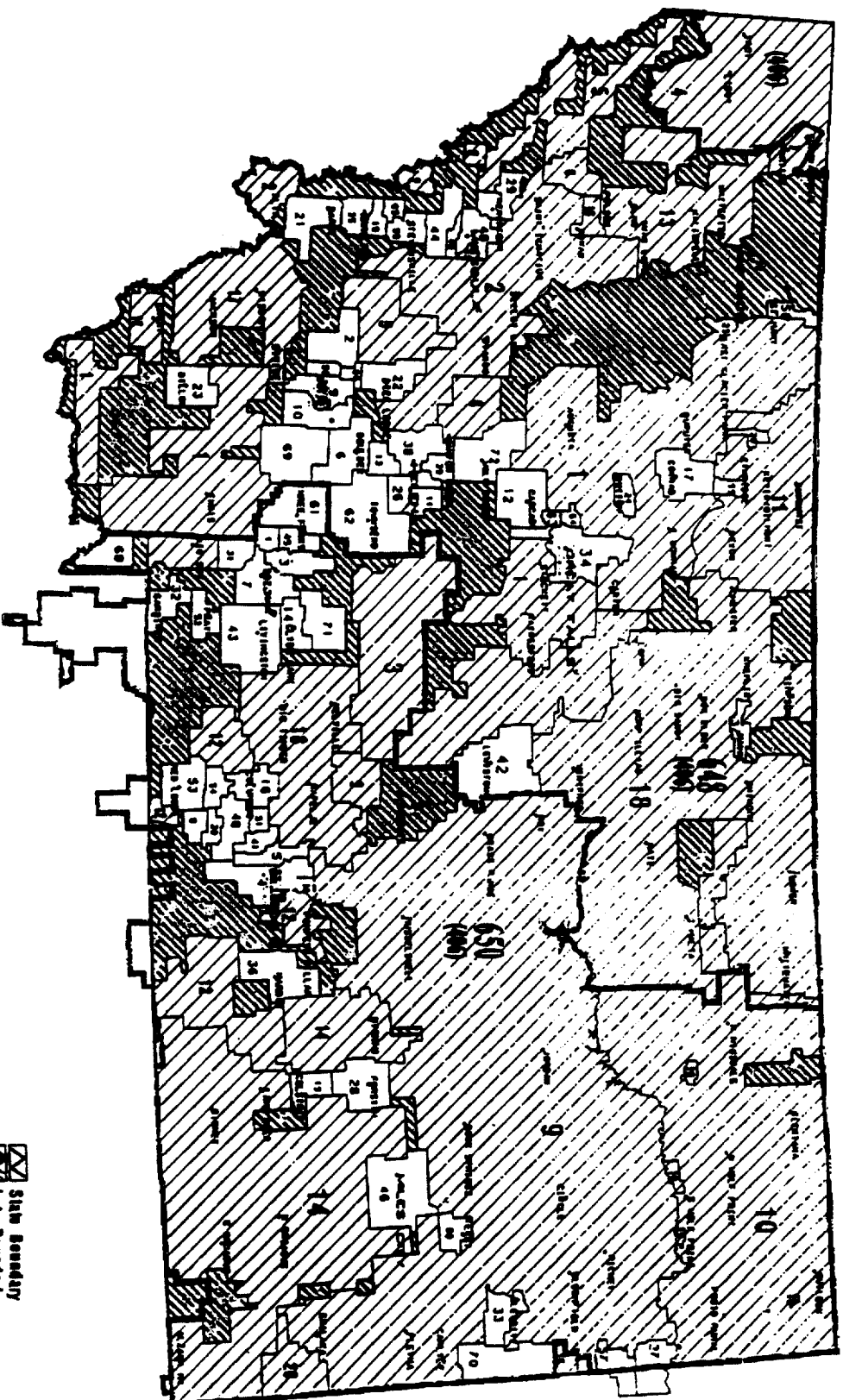
North Dakota Cellular Coverage



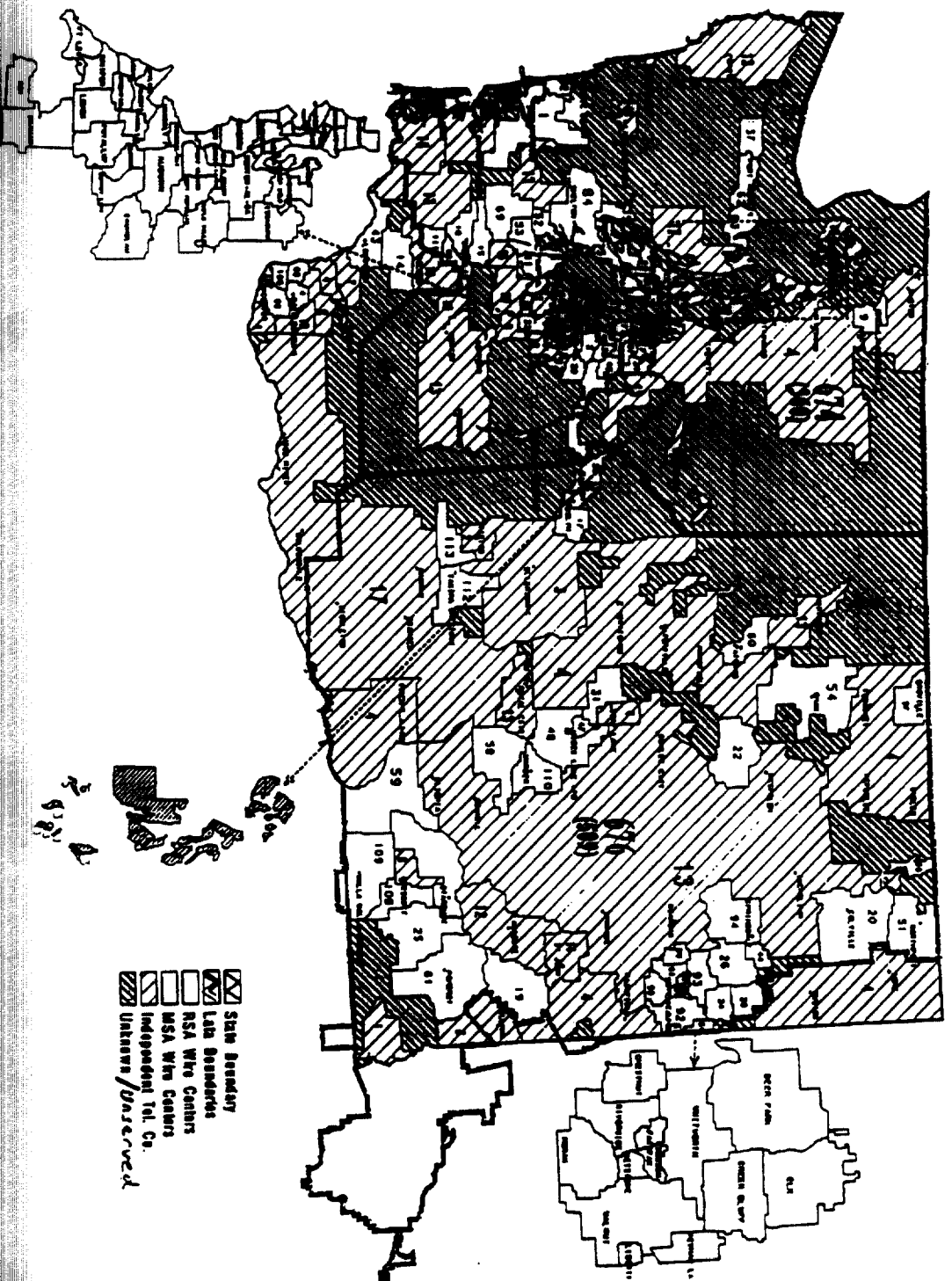
3



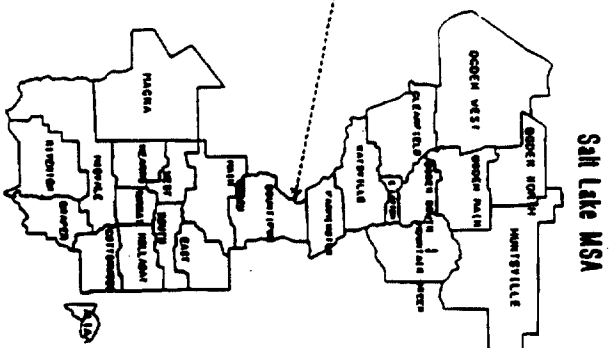
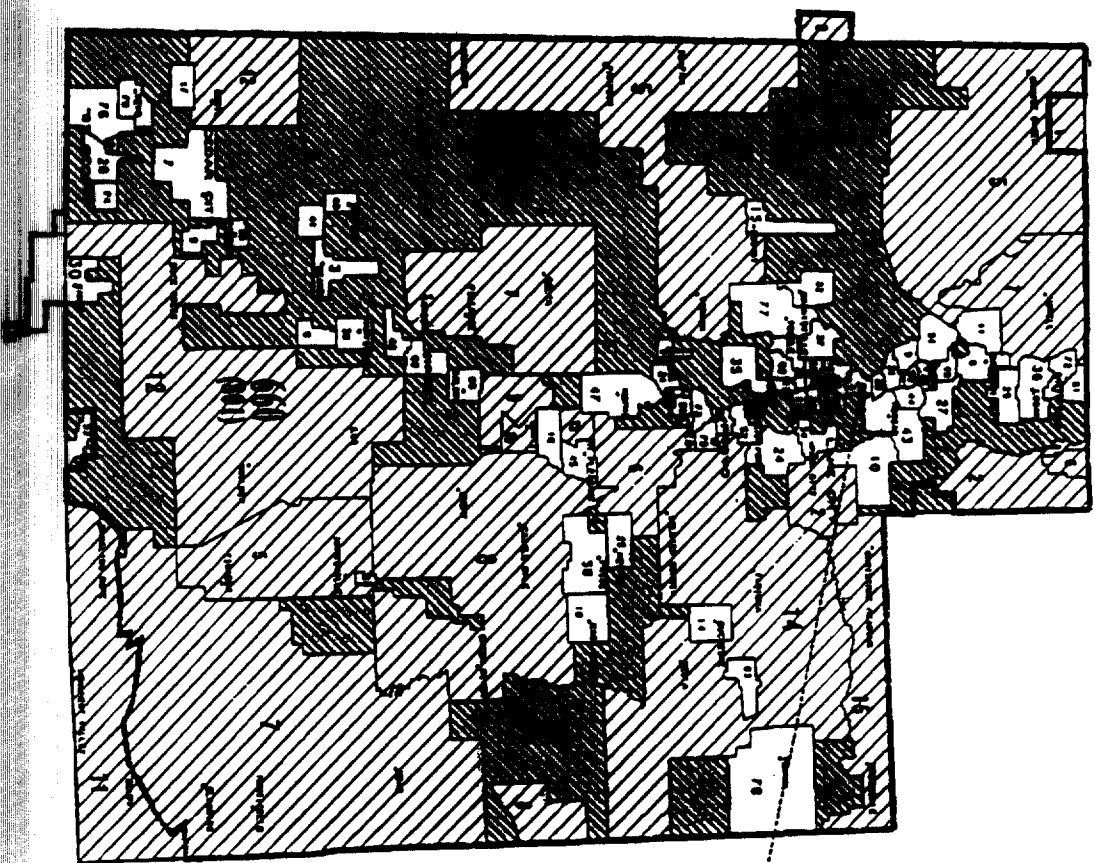
US West - Montana LATAs



US West - Washington LATA



100



- ☒ Spain Boundary
☒ Latin Boundary
☐ NSA Wire Centers
☐ NSA Wire Centers
☐ Independent Tel. Co.
☒ Unknown/Unreserved